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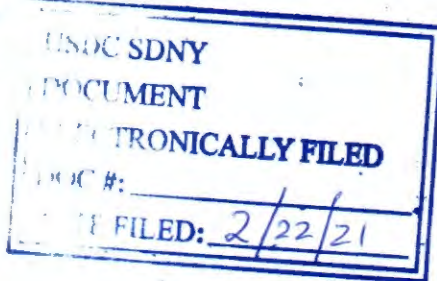
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MEMO ENDORSED

February 19, 2021

VIA ECF

Honorable Colleen McMahon
United States District Court
Southern District of New York
500 Pearl Street, Room 2550
New York, New York 10007

Re: Garcia v. New York City Health and Hospitals Corporation
Docket No.: 20-cv-09970-CM

Dear Judge McMahon:

We represent New York City Health and Hospital Corporation ("NYC H+H") in the above referenced matter. Per the briefing schedule approved by this Court, NYC H+H is serving and filing its Motion to Dismiss the Complaint on Monday, February 22, 2021.

Since the motions papers and the medical records attached as an exhibit thereto contain the plaintiff Felipa Garcia's protected health information, NYC H+H requests permission to file this motion under seal. Plaintiff's counsel has consented to this request.

It is respectfully requested that the Court grant the request to file the motion under seal. Thank you in advance for your consideration.

Respectfully submitted,

VIGORITO, BARKER, PATTERSON,
NICHOLS & PORTER, LLP

Megan A. Lawless

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*2/22/2021
you may file the motion
papers at his health
records under seal
however you must
provide chambers with
an unredacted paper
copy of your
motion and
supporting papers,
and
file a redacted
version of your motion w/
supporting papers 10
business days
before*

cc: Todd M. Rubin, Esq. – trubin@finzfir.com
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